

June 30, 2022

**VIA ECF**

The Honorable Sarah L. Cave  
United States District Court for the Southern District of New York  
500 Pearl St.  
New York, NY 10007

*Catherine McKoy, et al. v. Trump Corp., et al.*, 1:18-cv-9936 (LGS-SLC)

Dear Judge Cave:

The parties submit this joint letter pursuant to the Court's June 17, 2022 Order, ECF No. 438, and further to the parties' joint update of the same date, ECF No. 437, concerning the status of the parties' compliance with the Court's May 18, 2022 Order, ECF No. 424. As set forth below, the parties have continued to make progress, and both sides have continued taking depositions in accordance with the schedule previously provided to the Court. Defendants also made a small document production on June 28, and while Plaintiffs are still reviewing that production and reserve all rights, the parties do not presently have any ripe disputes to bring to the Court's attention.

On June 24, 2022, Defendants identified certain previously produced documents that bear on the Individual Defendants' compensation, which Plaintiffs agree was a productive step toward resolving the compensation issue. Plaintiffs are evaluating these documents and may follow up with Defendants with discrete questions, but otherwise Plaintiffs presently anticipate that they will address any additional issues related to the Individual Defendants' compensation during upcoming depositions.

On June 28, 2022, Defendants produced the two transcripts of depositions of Donald J. Trump in the Trump University litigation that they previously agreed to produce. This production did not include the exhibits to the transcripts. Plaintiffs disagree with Defendants' withholding of these exhibits, particularly in view of the Protective Order in place in this action, ECF No. 112. Plaintiffs are reviewing the transcript and the applicable protective orders and will continue to confer with Defendants with respect to these exhibits.

On June 28, 2022, Defendants also produced a list of donations from ACN and Robert Stevanovski and his spouse. Plaintiffs are reviewing these materials to determine whether they are sufficient to resolve this issue.

In view of this progress, the parties expect that depositions will continue as scheduled. Plaintiffs propose to provide a further update to the Court by July 14, 2022, setting forth any outstanding issues relating to the Court's May 18, 2022 Order that the parties are unable to resolve.

Respectfully submitted,

/s/ John C. Quinn

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